

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR. NO. 20-150(1) (NEB/BRT)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**MOTION TO RETAIN
ROUGH NOTES**

GREGORY LYNN MCCOY,

Defendant.

Defendant, by and through his attorney, respectfully moves the Court for an Order requiring all law enforcement personnel who have worked on this case to preserve and to continue to preserve all notes and memoranda originally prepared by them, regardless of the condition of those notes and regardless of whether those notes have been incorporated into other reports or memoranda that the government intends to turn over to the defendants. Depending on their contents, these rough notes may qualify as *Brady* or Jencks Act material at trial.

WHEREFORE, Defendant prays that this Court enter an Order requiring law enforcement personnel to preserve and maintain all rough notes relating to this matter.

Respectfully submitted,

Dated: August 24, 2020

/s/ Kevin O'Brien
Minnesota Attorney #80561
7101 York Avenue South
Suite 340
Edina, MN 55435
Tel: (612) 237-9510

Attorney for Defendant